

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

V.

TAVON DEMARIO BAILEY,
a/k/a "Straight G's"
a/k/a "T2"

Defendant.

Case No.: 1:18-cr-56

The Hon. Liam O'Grady

STATEMENT OF FACTS

The United States and the defendant, TAVON DEMARIO BAILEY (the “Defendant”), agree that the United States would have proven the following facts at trial, beyond a reasonable doubt, with admissible and credible evidence:

1. On or about December 5, 2017, the Defendant joined Tarvell Vandiver in Woodbridge, Virginia, within the Eastern District of Virginia. Vandiver served as the leader of the Imperial Gansta Blood (“IGB”) gang, which is a “hood” of the national gang, United Blood Nation. The Defendant was also a high ranking IGB member. The Defendant, Vandiver, and a source cooperating with law enforcement (“CS-1”) were scheduled to travel to an IGB gang meeting in Richmond.

2. When CS-1, Vandiver, and the Defendant entered CS-1's vehicle to drive to the gang meeting, the Defendant was armed with a Sig Sauer .40 caliber pistol. Vandiver then informed the Defendant that he did not have to travel with his firearm to the gang meeting because another IGB member intended to bring a firearm. The Defendant then agreed that he did not wish to travel with the firearm. Shortly thereafter, CS-1 drove his vehicle back to Vandiver's

apartment building and parked next to Vandiver's vehicle. The Defendant then placed his Sig Sauer .40 caliber pistol in the glove box of Vandiver's vehicle.

3. After placing his firearm in Vandiver's vehicle, the Defendant, Vandiver, and CS-1 drove to Richmond, Virginia, to attend the IGB gang meeting. Shortly thereafter, law enforcement executed a court-authorized search of Vandiver's vehicle and seized the defendant's loaded Sig Sauer .40 caliber pistol.

4. The Sig Sauer .40 caliber pistol is a firearm pursuant to Title 18, United States Code, Section 921(a)(3) and is not manufactured in the Commonwealth of Virginia. Any Sig Sauer .40 caliber pistol therefore found in the Commonwealth of Virginia has traveled in interstate commerce from its point of manufacture outside of the Commonwealth of Virginia into the Commonwealth of Virginia.

5. After the Defendant's arrest, law enforcement executed a court-authorized search of the Defendant's cellular phone. On this phone, law enforcement recovered several photographs of firearms with large-capacity magazines. And, in at least one photograph, the Defendant can be seen firing a weapon with a large-capacity magazine.

6. The Defendant has been convicted of the following felony offenses:
- a. Grand Larceny Auto, in violation of Code of Virginia § 18.2-95, Circuit Court of the City of Alexandria, sentenced on August 14, 2008;
 - b. Attempted Escape, in violation of Code of Virginia § 18.2-478, 18.2-26, Circuit Court of the City of Alexandria, sentenced on August 14, 2008; and
 - c. Possession of a Firearm by a Convicted Felon, in violation of Code of Virginia § 18.2-308.2, Circuit Court of the City of Alexandria, sentenced on October 3, 2013.

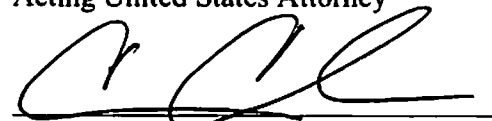
7. The acts taken by the Defendant in furtherance of the offense charged in this case, including the acts described above, were done willfully, knowingly, and with the specific intent to violate the law, and were not committed by mistake, accident or other innocent reason.

8. This statement of facts includes those facts necessary to support a guilty plea. It does not include each and every fact known to the Defendant, or to the United States, and it is not intended to be a full enumeration of all of the facts surrounding the Defendant's case.

Respectfully submitted,

Tracy Doherty-McCormick
Acting United States Attorney

By:

A handwritten signature in dark ink, appearing to be 'Carina A. Cuellar', written over a horizontal line.

Carina A. Cuellar
Colleen E. Garcia
Assistant United States Attorneys

Defendant's Signature: After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, Tavon Demario Bailey, and the United States, I hereby stipulate that the above statement of facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

Date: 2/2/18

Tavon Bailey
Tavon Demario Bailey
Defendant

Defense Counsel Signature: I am counsel for the defendant in this case. I have carefully reviewed the above statement of facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.

Date: 2/2/18

Michael S. Arif, Esq.
Michael S. Arif, Esq.
Counsel for Defendant